

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

MSP RECOVERY CLAIMS, SERIES LLC,
SERIES PMPI, a designated series of MAO-
MSO RECOVERY II, LLC, and MSPA
CLAIMS 1, LLC,

Plaintiffs,

Case No. 18-CV-02211(BRM)(LHG)

v.

SANOFI-AVENTIS U.S. LLC, NOVO
NORDISK INC., and ELI LILLY AND
COMPANY

Defendants.

**[PROPOSED]
SECOND AMENDED CASE MANAGEMENT ORDER
SCHEDULE AND DISCOVERY**

I. GENERAL DISCOVERY GUIDELINES

No change. See Case Management Order, ECF Doc. 162.

II. SCHEDULE¹

November 6, 2020 Case Management Order Deadline	March 11, 2021 Corrected Case Management Order Deadline	New Proposed Case Management Order Deadline	EVENT
-	-	August 4, 2021	Deadline for parties to complete search term negotiations
February 26, 2021	May 21, 2021	August 25, 2021	Deadline for Plaintiffs to retrieve and produce documents responsive to Defendants' first requests for production. Plaintiffs will begin

¹ The parties reserve the right to seek modifications of the schedule.

			producing documents on a rolling basis within 30 days after service of requests for production.
November 6, 2020	-	No change	Fact discovery begins.
November 13, 2020	-	No change	Defendants' initial disclosures under Rule 26 in <i>In re Insulin Pricing Litigation</i> , 17-cv-699 shall be produced to Plaintiffs. Plaintiffs shall serve initial disclosures under Rule 26 to Defendants and identify to Defendants each assignor on behalf of whom plaintiffs intend to assert claims in this action.
November 13, 2020	-	No change	Defendants serve initial Rule 34 requests for production, and the RPFs served hitherto by plaintiffs in <i>Insulin Pricing</i> shall be deemed served in this action.
November 13, 2020	-	No change	Deadline for parties to meet and confer regarding the preservation and production of electronically stored information ("ESI") and to submit to the Court an ESI protocol.
November 13, 2020	-	No change	Parties shall submit a stipulation agreed to be bound by the deposition protocol governing <i>Insulin Pricing</i> (Dkt. 366).
-	March 8, 2021	No change	Deadline to provide initial deponent list pursuant to Section III(5) of the deposition protocol.
February 19, 2021	April 20, 2021	No change	Deadline to amend pleadings. No depositions shall commence prior to this date.

March 5, 2021	July 26, 2021	September 15, 2021	Deadline for Plaintiffs to certify that their production of documents responsive to discovery requests is substantially complete.
March 19, 2021	May 4, 2021	No change	Deadline for Plaintiffs to propound requests for production to Defendants. The parties will meet-and-confer before propounding additional requests for production after the substantial completion deadline regarding reasonable, limited, and targeted requests.
March 19, 2021	August 9, 2021	September 29, 2021	Deadline for Defendants to propound requests for production to Plaintiffs. The parties will meet-and-confer before propounding additional requests for production after the substantial completion deadline regarding reasonable, limited, and targeted requests.
July 19, 2021	October 19, 2021	No change	Fact discovery on Defendants closes. This does not preclude data discovery, including related depositions, of third parties at a later date as needed for expert merits reports.
July 19, 2021	January 19, 2022	March 11, 2022	Fact discovery on Plaintiffs closes. This does not preclude data discovery, including related depositions, of third parties at a later date as needed for expert merits reports.
21 days after the Court's decision certifying or declining to certify the class in <i>In Insulin Pricing Litigation</i> , No.	No change	No change	Parties to submit a schedule for merits expert reports, Rule 56 and <i>Daubert</i> motions, and trial.

17-cv-699 (D.N.J.)			
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SO ORDERED.

Dated: _____, 2021

Hon. Dennis M. Cavanaugh (Ret.)
Special Master